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January 4, 2017

Honorable A. Kathleen Tomlinson United States Magistrate Judge United States District Court Eastern District of New York 100 Federal Plaza Central Islip, NY 11722

VIA ECF

Re: Thornburn v. Door Pro America, Inc. Case No. 2:16-cv-03839-DRH-AKT

Dear Judge Tomlinson:

This office represents the Defendant Door Pro America, Inc. in the above captioned matter. This letter is submitted in response to the December 16, 2016 letter from Plaintiff's counsel raising deficiencies in Defendant's discovery responses.

Attached as Exhibit A is my letter dated January 4, 2017 to Plaintiff's counsel addressing the discovery deficiencies raised in the December 16, 2016 letter. Defendant has addressed each and every deficiency raised, amended\supplemented the discovery responses, provided additional documents, and stated explicitly where there are no documents in existence responsive to the discovery request.

I respectfully submit that Defendant has cured the discovery deficiencies raised by Plaintiff, and that there is no longer any discovery dispute to be addressed by Your Honor. Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Michael K. Chong Michael K. Chong

cc: Saul Zabell, Esq. (Via ECF)